

HON. ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOSEPH JEROME WILBUR, a Washington
resident; JEREMIAH RAY MOON, a
Washington resident; and ANGELA
MARIE MONTAGUE, a Washington
resident, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

CITY OF MOUNT VERNON, a
Washington municipal corporation; and
CITY OF BURLINGTON, a Washington
municipal corporation,

Defendants.

No. 2:11-cv-01100-RSL

**STIPULATED PROTECTIVE
ORDER**

I. STIPULATION

1. This is a lawsuit for declaratory and injunctive relief.
2. Plaintiffs have served a subpoena on Mountain Law, PLLC, a third-party law firm currently providing public defense services to the Defendant Cities.
3. The subpoena seeks certain records related to Mountain Law's bid for public defense service contracts with the Cities, including Mountain Law's notes and financial cost calculations in preparation of the bid proposal. Some of the data and information requested is sensitive business-related data and potentially confidential and proprietary information belonging to Mountain Law ("Confidential Documents").

II. ORDER

4. If a party files or submits Confidential Documents with the Court in redacted form, Mountain Law shall have 10 days to file and serve a motion to have those Confidential Documents sealed in whole or in part. If Mountain Law fails to file and serve such a motion, the party that filed or submitted the Confidential Documents shall have the right to re-file or re-submit those documents without redaction.

6. This Order may be modified or revoked only by subsequent Court Order. Its terms shall survive any settlement, discontinuance, dismissal, severance, or other disposition of this litigation and the Court shall retain jurisdiction to enforce them.

Dated this 27th day of August, 2012.

Robert S. Lasnik
Robert S. Lasnik
United States District Judge